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202-514-5153 (v)  
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Catriona.M.Coppler@usdoj.gov

*Counsel for the United States*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 3:18-cv-11762

THOMAS DRISCOLL  
55 Ocean Avenue, Unit 10G  
Monmouth Beach, New Jersey 07750;

JEANANE DRISCOLL,  
55 Ocean Avenue, Unit 10G  
Monmouth Beach, New Jersey 07750;

WILLIAM CHRISTOPHER VOCKROTH  
71 Dorchester Way  
Shrewsbury, New Jersey 07702;

1st CONSTITUTION BANK  
2650 Route 130 North  
Cranbury, New Jersey 08512;

PNC BANK  
500 First Avenue  
Pittsburg, Pennsylvania 15219;

STATE OF NEW JERSEY,  
DIVISION OF TAXATION  
c/o Office of the Attorney General  
RJ Hughes Justice Complex  
25 Market Street, Box 080  
Trenton, New Jersey 08625; and  
  
CORPORATION SERVICE COMPANY  
801 Adlai Stevenson Drive  
Springfield, Illinois 62703

Defendants.

### **COMPLAINT FOR FEDERAL TAXES**

Plaintiff, the United States of America, at the request of the Chief Counsel of the Internal Revenue Service, a delegate of the Secretary of Treasury, and at the direction of the Attorney General, brings this civil action to collect the unpaid federal income tax liabilities of the taxpayers Thomas Driscoll and Jeanane Driscoll for the tax years 2010 through 2015, and to enforce the related federal tax liens that encumber the real property located at 258 Broad Street, Unit 1 in Red Bank, New Jersey and Thomas Driscoll's interest in Red Bank Dental Associates LLC.

### **JURISDICTION AND VENUE**

1. Jurisdiction for this action is conferred on the Court by 28 U.S.C. §§ 1340 and 1345 and by 26 U.S.C. §§ 7402(a) and 7403.

2. Venue is proper in this district by virtue of 28 U.S.C. § 1396.

### **PARTIES**

3. Plaintiff is the United States of America.

4. Defendants Thomas Driscoll and Jeanane Driscoll are residents of Monmouth Beach, New Jersey, which is located within the jurisdiction of this Court.

5. William Christopher Vockroth is named as a party under 26 U.S.C. § 7403(b) because he may claim an interest in the real property that is the subject of this action and an because he may claim an interest in Red Bank Dental Associates LLC (“Red Bank Dental”).

6. 1st Constitution Bank is named as a party under 26 U.S.C. § 7403(b) because it may claim an interest in the real property that is the subject of this action.

7. PNC Bank is named as a party under 26 U.S.C. § 7403(b) because it may claim an interest in the real property that is the subject of this action.

8. The State of New Jersey, Division of Taxation is named as a party under 26 U.S.C. § 7403(b) because it may claim an interest in the real property that is the subject of this action by virtue of state tax judgments against Thomas Driscoll and Jeanane Driscoll.

9. Corporation Service Company is named as a party under 26 U.S.C. § 7403(b) because it may claim an interest in Red Bank Dental by virtue of the line of credit it has extended to the business.

10. The real property at issue is located in Red Bank, New Jersey, which is located within the jurisdiction of this Court.

#### **COUNT I – REDUCE FEDERAL INCOME TAX ASSESSMENTS TO JUDGMENT**

11. The United States incorporates by reference the allegations set forth in Paragraphs 1 through 10 above.

12. A delegate of the Secretary of Treasury of the United States made various assessments for unpaid federal income taxes against Thomas Driscoll and Jeanane Driscoll on the dates and for the tax years set forth below:

<i>Type of Tax</i>	<i>Tax Year</i>	<i>Date of Assessment</i>	<i>Amount of Assessment</i>	<i>Balance Due as of May 15, 2017</i>
Income (Form 1040)	2010	12/5/2011	\$42,831.00	\$36,066.38
Income (Form 1040)	2011	9/24/2012	\$47,656.00	\$62,725.93
Income (Form 1040)	2012	6/24/2015	\$71,525.00	\$119,787.81
Income (Form 1040)	2013	6/24/2015 9/28/15	\$39,025.00 \$13,519.00	\$81,499.29
Income (Form 1040)	2014	12/21/2015	\$28,058.00	\$18,491.32
Income (Form 1040)	2015	11/21/2016	\$29,609.00	\$31,944.01
			<b>Total:</b>	<b>\$350,514.74</b>

13. Notice and demand for payment of the tax assessments described above were given to Thomas Driscoll and Jeanane Driscoll.

14. Statutory additions for interest and penalties have been assessed and accrued and will continue to accrue on the unpaid balance of the tax assessments described in Paragraph 12 above until paid in full.

15. Despite notice and demand for payment, Thomas Driscoll and Jeanane Driscoll have failed or refused to fully pay the tax assessments described in Paragraph 12 above.

16. By reason of the foregoing, Thomas Driscoll and Jeanane Driscoll are indebted to the United States for federal income tax and statutory additions to tax in the amount of \$350,514.74, plus statutory additions that will continue to accrue after that date according to law.

## **COUNT II – ENFORCE THE FEDERAL TAX LIENS AGAINST THE REAL PROPERTY**

17. The United States incorporates by reference the allegations set forth in Paragraphs 1 through 16 above.

18. Thomas Driscoll acquired the real property located at 258 Broad Street, Unit 1, Red Bank, New Jersey 07701 (the “Real Property”), on or about October 28, 1993. The Real Property consists of this tract and is more particularly described as:

BEING KNOWN AND DESIGNATED AS Unit 1 in “258 Broad Street situated in Broad Street October 13, Commons, a Condominium,” together with an undivided 18.769 percentage interest in and to the common elements appurtenant thereto, in accordance with, and subject to the terms, conditions, provisions, covenants, restrictions, easements, and other matters contained in the Master Deed for said Broad Street Commons, a Condominium, which Master Deed was dated October 13, 1993, and recorded on October 20, 1993 in the Clerk’s Office of the County of Monmouth, in Deed Book 5256, Page 245, as the same may hereafter be lawfully amended.

19. On or about June 27, 2005, Thomas Driscoll conveyed the Real Property to himself and William Christopher Vockroth as tenants in common.

20. By reason of the assessments made against Thomas Driscoll and Jeanane Driscoll for the unpaid federal income taxes, interest, and penalties described in Paragraph 12 above, federal tax liens arose by operation of law under 26 U.S.C. §§ 6321 and 6322 on the dates of the assessments, and attached to all property and rights to property owned or thereafter acquired by Thomas Driscoll or Jeanane Driscoll, including, but not limited to, Thomas Driscoll’s interest in the Real Property.

21. Notices of the federal tax liens for assessments described in Paragraph 12 above were filed on or about August 30, 2012; May 15, 2013; July 6, 2015; October 14, 2015; January 11, 2016; and January 13, 2017, respectively, with the Office of the Monmouth County Clerk.

22. The United States is the holder of valid and subsisting tax liens that encumber Thomas Driscoll’s interest in the Real Property and the Real Property itself.

23. William Christopher Vockroth may claim an interest in the Real Property by virtue of the Deed that was entered into on or about June 27, 2005, in which Thomas Driscoll conveyed the Real Property to himself and William Christopher Vockroth as tenants in common.

24. Under 26 U.S.C. § 7403, the United States is entitled to enforce its liens against the Real Property; to have the entire property sold at a judicial sale free and clear of all rights, titles, claims, and interests of the parties; and to have the proceeds distributed, after the payment of the cost of sale and any real estate taxes due and owing, among the parties in accordance with their lawful priorities.

**COUNT III – ENFORCE THE FEDERAL TAX LIENS AGAINST RED BANK DENTAL**

25. The United States incorporates by reference the allegations set forth in Paragraphs 1 through 24 above.

26. Red Bank Dental is a New Jersey limited liability company.

27. Upon information and belief, Thomas Driscoll and William Christopher Vockroth are the sole members and managers of Red Bank Dental.

28. By reasons of the assessments made against Thomas Driscoll and Jeanane Driscoll for unpaid federal income tax, interest, and penalties described in Paragraph 12 above, federal tax liens arose on the dates of assessments and attached to all property and rights to property owned or thereafter acquired by Thomas Driscoll and Jeanane Driscoll, specifically including Thomas Driscoll's interest in Red Bank Dental.

29. The United States has valid and subsisting tax liens that encumber Thomas Driscoll's interest in Red Bank Dental.

30. William Christopher Vockroth may claim an ownership interest in Red Bank Dental.

31. Corporation Service Company may also claim an interest in Red Bank Dental by virtue of the line of credit it has extended to the business.

32. The United States is entitled to judgment enforcing its federal tax liens by appointing a receiver to sell Thomas Driscoll's interest in Red Bank Dental free and clear of all

rights, titles, claims, and interests of the parties, and to have the proceeds distributed, after the payment of the cost of sale, among the parties in accordance with their lawful priorities.

WHEREFORE, the United States of America respectfully requests that this Court:

A. Render judgment in favor of the United States and against Thomas Driscoll and Jeanane Driscoll with respect to the unpaid federal income tax liabilities for the 2010 through 2015 taxable years in the amount of \$350,514.74 as of May 15, 2017, together with all interest and penalties that will continue to accrue thereafter according to law;

B. Order, adjudge, and decree that the United States has valid and subsisting tax liens against all property and rights of property of Thomas Driscoll and Jeanane Driscoll, including, but not limiting, their interest in the Real Property;

C. Order, adjudge, and decree that the federal tax liens attaching to the Real Property be foreclosed and the property be sold at a judicial sale according to law, free and clear of any right, title, lien, claim, or interest of any of the defendants herein;

D. Order that the net proceeds from the sale be distributed to pay the sale expenses, any local property taxes, satisfy all liens (including tax liens) according to their priority, and that any remaining proceeds go to those having valid claims;

E. Order, adjudge, and decree that the United States has valid and subsisting liens against Thomas Driscoll's interest in Red Bank Dental;

F. Enforce the federal tax liens securing the liabilities described in this Complaint upon Thomas Driscoll's interest in Red Bank Dental by appointing a receiver to sell Thomas Driscoll's interest in Red Bank Dental free and clear of all rights, titles, claims, and interests of the parties;

G. Order, adjudge, and decree that the net proceeds from the sale be distributed to pay the sale expenses, satisfy all liens (including tax liens) according to their priority, and that any remaining proceeds go to those having valid claims;

H. Grant the United States of America such other relief as it deems just and proper under the circumstances.

Date: July 18, 2018

CRAIG CARPENITO  
United States Attorney

RICHARD E. ZUCKERMAN  
Principal Deputy Assistant Attorney General

s/ Catriona M. Coppler  
CATRIONA M. COPPLER  
Trial Attorney, Tax Division  
U.S. Department of Justice  
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**DESIGNATION OF AGENT FOR SERVICE UNDER LOCAL CIVIL RULE 101.1(F)**

In accordance with Local Civil Rule 101.1(f), the undersigned hereby designates the United States Attorney for the District of New Jersey to receive service of all notices or papers in this action at the following address:

Chief, Civil Division  
United States Attorney's Office  
District of New Jersey  
402 East State Street, Room 430  
Trenton, NJ 08608

Date: July 18, 2018

s/ Catriona M. Coppler  
CATRIONA M. COPPLER  
Trial Attorney, Tax Division  
U.S. Department of Justice  
P.O. Box 227  
Washington, D.C. 20044  
202-514-5153 (v)  
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## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

United States of America

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Catriona M. Coppler, U.S. Department of Justice, Tax Division, P.O. Box  
227, Ben Franklin Station, Washington, DC 20044, (202) 514-5153

**DEFENDANTS**

Thomas Driscoll, Jeanane Driscoll, William Christopher Vockroth, Red  
Bank Dental Associates LLC, 1st Constituion Bank, PNC Bank, State  
of New Jersey Division of Taxation, Corporation Service Company

County of Residence of First Listed Defendant Monmouth County

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
- ☐ 2 U.S. Government Defendant
- ☐ 3 Federal Question  
(U.S. Government Not a Party)
- ☐ 4 Diversity  
(Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice <b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input checked="" type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education <b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding    ☐ 2 Removed from State Court    ☐ 3 Remanded from Appellate Court    ☐ 4 Reinstated or Reopened    ☐ 5 Transferred from Another District (specify)    ☐ 6 Multidistrict Litigation - Transfer    ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

26 U.S.C. Sections 7402(a), 7403

Brief description of cause:

Reduce federal tax assessments to judgment and foreclose federal tax liens

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

350,514.74

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE \_\_\_\_\_

DOCKET NUMBER \_\_\_\_\_

DATE

07/18/2018

SIGNATURE OF ATTORNEY OF RECORD

s/ Catriona M. Coppler

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_

AMOUNT \_\_\_\_\_

APPLYING IFP \_\_\_\_\_

JUDGE \_\_\_\_\_

MAG. JUDGE \_\_\_\_\_

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

### Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
  - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
  - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
- United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.